

EXHIBIT B
(Notice of Vehicle Sale Motion)

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**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON**

In re:

GIGA WATT, Inc., a Washington
corporation,

Debtor.

Case No. 18-03197 FPC 11

The Honorable Frederick P. Corbit

**NOTICE OF AND OPPORTUNITY
FOR HEARING ON CHAPTER 11
TRUSTEE'S MOTION FOR ORDER
APPROVING (I) SALES OF
VEHICLES, (II) SHORTENED
NOTICE AND (III) LIMITED
NOTICE**

PLEASE TAKE NOTICE THAT Mark D. Waldron, as the duly
appointed Chapter 11 Trustee herein (the “**Trustee**”), has filed a motion (the
“**Motion**”) to approve the sale of a Ford box truck (the “**Box Truck**”) to David
Knowles for \$3,000 and a 2004 Chevy Avalanche (the “**Avalanche**”) to Skyler
Simpson for \$3,000. (The Box Truck and the Avalanche are referred to as the
“**Vehicles**”). The sales are “As Is.” The estimated fair market value of the
Vehicles is not more than \$6,000. The motion and supporting memorandum and
declaration are on the Court’s docket and may be obtained from the Court clerk.

NOTICE OF AND OPPORTUNITY FOR HEARING ON CHAPTER 11
TRUSTEE'S MOTION FOR ORDER APPROVING (I) SALES OF VEHICLES,
(II) SHORTENED NOTICE AND (III) LIMITED NOTICE -- Page 1

1 The Trustee has further moved for an Order requiring that any objection to
2 the Motion be filed and served upon undersigned counsel by May 4, 2020 and that
3 service of the Notice be limited to the (i) U. S. Trustee's Office, (ii) Official
4 Unsecured Creditors' Committee, (iii) ECF parties; and (iv) top 20 creditors on
5 the ground that: (a) the Vehicles are no longer useful, (b) their insurance will lapse
6 on May 22, 2020, (c) the Trustee must remove equipment from the Pangborn Site
7 by May 7, 2020, where the Box Truck is located, (d) the Trustee needs to remove
8 the Avalanche from the TNT Facility before its sale and (e) the cost of service on
9 all creditors would be prohibitively expensive. The proposed sales are an exercise
10 of sound business judgment. The Trustee conferred with an auctioneer and a car
11 deal before accepting the offers. He also negotiated the prices.

12 **PLEASE TAKE FURTHER NOTICE** that any objection to the relief
13 requested in the Motion must be served on undersigned counsel and filed with the
14 Court within 10 days of the Date of Service set forth below. The Motion may be
15 granted without further notice unless a written objection is timely served on
16 undersigned counsel and timely filed with the Court.

17 **DATE OF SERVICE: April 24, 2020**

18 Dated: April 24, 2020

POTOMAC LAW GROUP

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20 By: /s/ Pamela M. Egan
Pamela M. Egan (WSBA No. 54736)

21 *Attorneys for Mark D. Waldron, Chapter 11*
22 *Trustee*

23 **NOTICE OF AND OPPORTUNITY FOR HEARING ON CHAPTER 11**
24 **TRUSTEE'S MOTION FOR ORDER APPROVING (I) SALES OF VEHICLES,**
25 **(II) SHORTENED NOTICE AND (III) LIMITED NOTICE -- Page 2**